



INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (11-07)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Pollution Prevention and Technical Assistance
100 North Senate Avenue IGCS W041
Indianapolis, IN 46204-2251
Telephone: (800) 988-7901
FAX: (317) 233-5627
E-mail: esp@idem.in.gov
www.in.gov/idem/prevention/es_p

When to use this annual report form...

STOP! Is your facility a member of the U.S. Environmental Protection Agency's National Environmental Performance Track and Indiana Environmental Stewardship Program? If so, please use the U.S. EPA National Environmental Performance Track Annual Performance Report form available at <http://www.epa.gov/performance/track/program/report.htm>. The U.S. EPA will notify IDEM after receiving your annual performance report.

GO! Please use this annual report form if you are only a member of the Indiana Environmental Stewardship Program and not a member of the National Environmental Performance Track. Your Annual Performance Report should be reviewed and signed by a senior manager at your facility prior to submittal. Once signed, fax, mail, or e-mail the report to IDEM. If you have any questions, please contact the ESP Program Manager at 800-988-7901.

The Indiana Environmental Stewardship Program (ESP) Annual Performance Report should demonstrate progress toward objectives and targets AND certify ESP requirements continue to be achieved. The Annual Performance Report should cover the twelve (12) month calendar year and include the status of projects committed to in your facility's original ESP application, results of completed projects, and assurance that an annual internal environmental management system audit was conducted by your facility. Indiana ESP facilities must submit an Annual Performance Report by April 1st of every year, for each calendar year in which the entity has been a member for at least three (3) full months.

Please do not include any confidential business information in your Annual Performance Report. Public access laws require IDEM to make the Annual Performance Report publicly available, which may include posting all portions of your report on the Indiana ESP Web site.

SECTION A FACILITY INFORMATION

Name of Facility
American Commercial Lines LLC

Name of Parent Company (If applicable)
American Commercial Lines Inc.

Street Address (number and street)
1701 East Market Street

City/State/ZIP Code
Jeffersonville, IN 47130

Facility/Company Web site
www.aclines.com

CONTACT INFORMATION

Contact Name (Mr./Mrs./Ms./Dr.)

Title
Sr. Vice President & General Counsel

Telephone number
812-288-0100

FAX number
812-288-0294

E-mail address
Dawn.Landry@aclines.com; Brooke.Egan@aclines.com

Mailing Address (if different from facility address)
1701 East Market Street

City/State/ZIP Code
Jeffersonville, IN 4713

Reporting Period Dates
1/1 - 12/31/2008

If this is your third Annual Performance Report, do you wish to renew your Indiana Environmental Stewardship Program membership?
☐ Yes---If yes, please complete all sections of this annual report.

☒ No---If no, you can skip Section D of this annual report.

CHANGE IN INFORMATION

In your ESP application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any changes or additions to your facility's list of products or activities? If so, please list them in the space below.

☐ Yes ☒ No

SECTION B

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT

Why do we need this information?

IDEM needs information on the performance and assessment activities of your Environmental Management System (EMS).

What do you need to do?

Please summarize your facility's EMS assessments. Attach additional sheets as necessary.

<p>1. Is your facility currently registered to a recognized third-party EMS standard?</p> <p><input type="checkbox"/> Yes</p> <p>a. If yes, when was an EMS audit or other assessment last conducted by an independent third party at your facility? Please provide the <i>type</i> (e.g., ISO 14001 certification), <i>scope</i>, and <i>month</i> of the last assessment.</p> <p><input type="checkbox"/> No</p> <p>b. If no, when was an internal or corporate EMS audit last conducted at your facility? Please provide the <i>scope</i> and <i>month</i> of the last assessment.</p>	<p>Year: 2008</p> <p>Type: American Waterways Operations, Responsible Carrier Program & American Chemistry Counsel, Responsible Care Management System</p> <p>Scope: Environmental, health, safety and security management in towing operations.</p> <p>Month: February - March</p> <p>Year:</p> <p>Scope:</p> <p>Month:</p>	
<p>2. When did your facility last conduct an internal or corporate compliance audit? Please provide the <i>scope</i> and <i>month(s)</i> of each audit, and indicate <i>who</i> conducted the audit(s) (e.g., facility staff, corporate groups, third party). Do not include audits, inspections, or site visits by regulatory organizations.</p>	<p>Year: 2008</p> <p>Scope: Responsible Care Management System</p> <p>Month(s): February - March</p> <p>Who: Foret Enterprises, Houston, Texas</p>	
<p>3. (Optional) Please describe any other audits that were conducted at your facility.</p>	<p>Additional customer audits, including BP and Shell Chemical.</p>	
<p>4. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?</p> <p><input checked="" type="checkbox"/> Yes</p> <p>a. If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s).</p> <p><input type="checkbox"/> No</p> <p>b. If no, please explain your plans to correct these instances.</p> <p><input type="checkbox"/> No such instances identified.</p>	<p>Minor non-conformities in record keeping and training documentation were identified and corrected.</p>	
<p>5. Explain the emergencies experienced within the facility during the past year. Were the applicable emergency and contingency plans detailed in the EMS effective? What changes, if any, have been made to your facility's emergency or contingency plans?</p>	<p>ACL's vessels operate under Emergency Response Plans required by the U.S. Coast Guard. Experience has included releases, collisions and groundings. Plans are properly followed.</p>	
<p>6. When was the last Senior Management review of your EMS completed?</p>	<p>Month/Year: December 2007</p> <p>Who headed the review? Name and Title: Sam George, Vice President Environmental Compliance</p>	
<p>7. When did your facility last conduct a systematic identification or review of your environmental aspects?</p>	<p>Month/Year:</p>	
<p>10. (Optional) Please provide a narrative summary of progress made toward EMS objectives and targets <u>other than those reported as an Environmental Performance Initiative in the following section</u>. You may limit the summary to environmental aspects that are <i>significant</i> and towards which <i>progress</i> has been made during the last calendar year. Attach additional sheets as necessary.</p>	<p>Environmental Aspect</p>	<p>Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)</p>

SECTION C		ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS			What do you need to do?
Why do we need this information? Facilities need to share the results of the environmental improvement initiative that was pursued during the reporting period.					Use the following table to summarize your facility's environmental performance as compared to your ESP environmental improvement initiative.
Category: Air Emissions					
Aspect: Diesel engine emission					
Specific Information on Aspect (optional): CO					
	Baseline	Progress during year 2008	Environmental Improvement Initiative Goal	Cost Savings (if applicable)	
Actual Quantity (per year)	0.77	.65	5%	Fuel spend decreased.	
Measurement Unit	pounds per hour	pounds per hour	pounds per hour		
Normalized Quantity (per year)	N/A	N/A			
Basis for your Normalizing Factor (e.g., gallons of paint produced)	N/A	N/A			
Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress. In 2008, ACL had a diesel engine program which resulted in improved turbo charging on 14 selected engines and repowering of 5 selected engines from non-certified to U.S. EPA Tier II engines. ACL's 2008 fuel burn was 68,000,000 gallons, down from a fuel burn of 75,000,000 gallons in 2007. This reduction in fuel consumption has an associated reduction in CO emissions. Portions of this reduction were due directly to the turbo charging and repowering.					
Please list any state, EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL). Kentucky Environmental Protection Cabinet					
(Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here.					

SECTION D		ENVIRONMENTAL IMPROVEMENT INITIATIVES		What do you need to do?
Why do we need this information? Facilities need to demonstrate their commitment to improving environmental performance.				Refer to the Environmental Performance Table.
For ESP membership, you must identify three (3) environmental improvement initiatives for each 3-year membership term. One (1) initiative was identified in the application and the remaining will be identified each year in the annual report. Identify the new initiative that will begin this year by answering the following questions. Choose an indicator from the Environmental Performance Indicator Table to measure the identified environmental initiative. The Environmental Performance Indicator Table is provided with the ESP Application and is also available at http://www.in.gov/DEM/prevention/esptable.doc . The indicator you select for your initiative should be related to the objectives and targets in your EMS. Where possible, indicators should also be identified as having a significant environmental impact in your EMS. No more than two of your indicators can be from the same environmental category during the 3-year term. If you are not sure how your objectives and targets fit into the indicators from the Environmental Performance Indicator Table or whether your indicators are significant, call IDEM at 800-988-7901.				
Please complete the following questions according to the environmental indicator you selected from the Environmental Performance Indicator Table. Additional information is required for air, hazardous waste, solid waste, and energy indicators as requested in Appendix 1.				
1a What category have you selected from the Environmental Performance Table? (If the category is Energy Use, Waste, or Air Emissions for Total GHGs, please turn to Appendix 1 to complete additional questions pertaining to the category you have selected.) Material Use				
1b What indicator have you selected from the Environmental Performance Table? Materials Used				
1c All measurements should represent the performance level for the indicator across the entire facility. For many indicators, you may choose to focus your initiative on a specific subset of the indicator (e.g., a specific material, process, VOC, group of toxic air emissions, or particular waste component). Does your initiative include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific process, substance, or component (e.g., ethane, cardboard)? <input type="checkbox"/> All <input checked="" type="checkbox"/> Specific				
If your initiative is specific to a substance or component, please provide additional detail on your indicator (e.g., specific chemical to be reduced, specific waste component). gallons				
1d What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? process management				
2a Does this initiative address a significant aspect in your EMS?				

- ☒ Yes
☐ No

2b If no, please explain why you believe this indicator should be included as an environmental improvement initiative.

Stop! If the category listed in Question 1a is Energy Use, Waste, or Air Emissions for Total GHGs, please skip Questions 3a – 3b below and turn to Appendix 1 to complete the questions pertaining to the category you listed. After completing Appendix 1, return to question 4 and complete the remaining questions regarding your facility's environmental improvement initiative.

3a What units are you using to quantify this indicator? Gallons

(Please refer to the Environmental Performance Indicator Table for the acceptable units for each indicator.)

3b List the baseline annual quantity of the indicator and the annual quantity you are committing to achieve by the future year.

Baseline quantity	68,000,000 Gallons	Year 2008
Future year quantity (not including production)	62,000,000 Gallons	Year 2009

4 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?

- ☒ Normalized goal (i.e., indexed to level of business in baseline year)
☐ Absolute goal (i.e., demonstrates improvement even if production increases)

5 Whether your goal is absolute or normalized, you will need to provide normalizing factors and normalized quantities in your annual performance reports. Please briefly describe your basis for normalizing. Examples of potential normalizing basis include: gallons of paint produced, square feet of circuit boards sold, number of patients seen, dollars of sales adjusted for inflation, or number of employees (for R&D and administrative sites only).

Normalized for # of operating hours.

6a Are you subject to Federal, State, tribal, or local regulatory requirements for this indicator?

- ☐ Yes
☒ No

6b If yes, explain how your initiative exceeds regulatory requirements.

SECTION E

PUBLIC OUTREACH AND PERFORMANCE REPORTING

Why do we need this information?

IDEM needs to know how environmental information was shared with the public.

What do you need to do?

Describe how the facility has shared and plans to share environmental information.

Please briefly describe the activities that your facility conducted during this reporting period to interact with the community on environmental issues and to report publicly on its environmental performance. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

ACL is proud to participate with the community on environmental activities. In 2008, ACL sponsored a river clean-up effort in the Louisville harbor with Living Lands and Waters, a not-for profit organization that ACL supports financially and with in-kind donations. Additionally, ACL has participated in community environmental initiatives, including: the Ohio River Valley Water Sanitation Commission's, as the ORSANCO River Sweep project and the ORSANCO River Education Center; the Falls of the Ohio Foundation, Inc., for the Rock the Rocks event; the Clarksville Riverfront Foundation; the Ohio River Greenway Development Commission, as the Run/Walk for the Ohio River Greenway Project; the Louisville Water Company's 2008 Adventures in Water Festival; the Louisville Science Center for river awareness; and others. ACL was accepted into now defunct U.S. EPA Performance Track in January 2008.

Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate.

- ☒ Website (<http://www.aclines.com>)
☐ Open House
☐ Meetings
☐ Press Releases
☐ Community Advisory Panel
☒ Other Annual Shareholder Meeting of ACLI

SECTION F**ADDITIONAL INFORMATION**

Why do we need this information?

This information will help IDEM to effectively manage the Environmental Stewardship Program.

What do you need to do?

Answer the questions as completely as possible.

1. In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve months (include information about each particular program).
ACL was accepted into the now defunct U.S. EPA Performance Track Program in January 2008.
2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.
Not as of this time.
3. If your facility was not registered to the ISO 14001 standard prior to becoming an ESP member, has ESP helped you to pursue registration? If so, how has ESP been instrumental in achieving registration?
Not applicable.
4. Explain the measured or perceived results from receiving, documenting, and responding to external communication.
Continuous improvement is not necessarily measured. ACL reacts to public comment by renewed commitment or adjustment where needed.
5. How have community residents and businesses reacted to your facility participating in the Indiana Environmental Stewardship Program?
The local government and regulatory authorities recognize ACL's continued efforts and participation in this program.
6. According to the measurement program developed and implemented by your facility to measure Environmental Management System success, is your facility's EMS successful? Why or why not? If not, what changes will be made to ensure continual environmental improvement and future EMS success?
Yes, fuel consumption was reduced in part due to compliance with the goals and efforts hereunder, as an environmental as well as financial benefit. ACL is pleased to participate in this program and looks forward to continued participation and mutual benefit.

CERTIFICATION AND PLEDGEOn behalf of **American Commercial Lines LLC** (name of facility),

I certify that the information contained in this Annual Performance Report and attachments is accurate to the best of my knowledge and that this facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with all applicable federal, state, and local environmental requirements, or has a corrective action program in place to attain compliance.

We, **American Commercial Lines**, commit to maintaining the principles and goals outlined in our Environmental Management System for our facility's Indiana Environmental Stewardship Program status. We agree to strive for full compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We agree to promote the Indiana Environmental Stewardship Program and to share our success stories with other facilities. We understand that the Annual Performance Report must be submitted to IDEM by April 1st of each year and that we must reapply to the Indiana Environmental Stewardship Program every three years.

I understand that the information provided in this Annual Performance Report will be public record. I am the senior facility manager or authorized facility signatory, and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is submitting this Annual Performance Report.

Signature 	Title Sr. Corporate Counsel	Date (month, day, year) 6/30/09
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Please mail, fax, or e-mail your completed Environmental Stewardship Program Annual Performance Report to:

IDEM-OPPTA
ESP Program Manager
MC 64-00 IGCS W041
100 North Senate Avenue
Indianapolis, IN 46204-2251

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